

## MICRODERMABRASION

### Position of the Department of Consumer and Industry Services

Equipment used for microdermabrasion has been approved for use by the FDA with the stipulation that the equipment is to be sold only to licensed individuals. The FDA left to each state the decision of which licensed individuals may purchase the equipment.

The State of Michigan has determined that only physicians licensed to practice medicine in Michigan may purchase microdermabrasion equipment. Therefore, companies selling microdermabrasion equipment may only sell to physicians.

The decision of the Michigan Department of Consumer & Industry Services that the use of microdermabrasion equipment is not within the scope of practice of licensed cosmetologists or estheticians was based on a thorough review of literature describing microdermabrasion, the Michigan Public Health Code, the Occupational Code, the Administrative Rules of the Board of Cosmetology and the Administrative Rules of the Boards of Medicine and Osteopathic Medicine and Surgery.

Microdermabrasion falls within the definition of the practice of medicine because it utilizes equipment that removes a layer of skin. The "practice of medicine" as defined by the Michigan Public Health Code includes the following: "the diagnosis, **treatment**, prevention, cure, or **relieving** of a human disease, ailment, **defect, complaint**, or other physical or mental condition, by attendance, advice, **device**, diagnostic test, or other means, or offering, undertaking, attempting to do, or holding oneself out as able to do, any of these acts."

A physician may delegate the microdermabrasion procedure to another licensed individual *if* the delegatee is working under the physician's supervision. Supervision, as defined by the Michigan Public Health Code, requires the following:

- \* The physician must assure that the supervised individual has been appropriately trained to perform microdermabrasion.
- \* The physician must be available to the supervised individual by radio, telephone, or telecommunication at all times.
- \* The physician must regularly review the practice of the supervised individual including observation, review of medical records, and ongoing education.
- \* The physician must develop written procedures and protocols for use by the supervised individual.

Under proper supervision, microdermabrasion procedures could be delegated to licensed individuals including a physician's assistant, registered nurse, cosmetologist, or esthetician. However, the supervised individual must not imply that he or she is independently performing the procedure under his or her own license. Because the supervised individual is working under delegation from the physician, it is the physician's licensure that allows for the practice of the supervised individual. Consequently, if a

problem occurs while the supervised individual is performing the procedure, the physician is ultimately responsible for the outcome.

The Bureau of Commercial Services has also issued a position statement regarding licensed cosmetologists and estheticians performing microdermabrasion. Additional information is available on the website at [www.cis.state.mi.us/bcs](http://www.cis.state.mi.us/bcs).